

IN THE CIRCUIT COURT OF Carroll COUNTY, ARKANSAS
DIVISION _____ DISTRICT _____

Joseph
Emery
Guess

PLAINTIFF

VS.

CAUSE NO. 21-221 (ED)

Holly
Leannette
Guess

DEFENDANT

COMPLAINT

Comes now the Plaintiff, Joseph E Guess, and for the

Plaintiff's cause of action against the Defendant states and alleges as follows, to-wit:

FILED FOR RECORD
MARILYN FERRIER
CIRCUIT CLERK
2022 APR 15 PM 2:42
CARROLL COUNTY, ARKANSAS
EASTERN DISTRICT

I.

The Plaintiff is a citizen and resident of the State of Arkansas, County of Carroll, and has been such for more than sixty (60) days prior to filing this Complaint. The Defendant is a citizen and resident of the State of Arkansas. The Court has jurisdiction of the parties and subject matter hereto.

II.

That the parties were married on or about the 20th day of February, 2008, and lived as Husband and Wife until they separated on or about the 21st day of March, 2021. They have lived separate and apart from and since that date.

III.

Plaintiff is entitled to a divorce on the grounds of (Check appropriate box):

- ☐ Living separate and apart from each other for eighteen continuous months without cohabitation, regardless of fault or reason.
- ☒ Defendant has treated the Plaintiff with such personal indignities, habitually, systematically and persistently pursued in such a manner as to make the Plaintiff's condition in life intolerable.

IV.

There are 1 minor children of said marriage, and the wife ☐ is ☒ is not now pregnant. (List all minor children below.)

<u>Name</u>	<u>Present Address</u>	<u>Sex</u>	<u>Date of Birth</u>	<u>Soc. Sec. No.</u>
Tiffany D. Guess	14600 Holly rd	Henryetta	OK	Female

- ☐ I was a party or witness in the following case involving our child(ren) (provide all specifics including the state, the court, the case number, the type of case and the date of the child custody order, if any): _____
- _____
- ☐ I know of the following court case that could affect our child(ren) (provide all specifics including the court, the case number, the type of case and the date of the child custody order, if any): _____
- _____
- ☐ In addition to the parents, the following person/s claim custody, visitation or child support

Redacted Copy

for our child(ren) (list names and addresses): _____

- ☐ If our child(ren) has/have lived with someone other than a parent, the names and present addresses of the person(s) with whom our child(ren) has/have lived during the past five years is: _____

V.

All matters involving custody/visitation and child support have been resolved and the terms agreed to in the Separation and Property Settlement Agreement mentioned below and attached hereto.

VI.

All matters involving property of the marriage, both real and personal, have been resolved and the terms agreed to in the Separation and Property Settlement Agreement mentioned below and attached hereto. All debts have likewise been resolved by the parties in the Separation and Property Settlement Agreement attached herein as Exhibit "A".

VII.

Wife ☐ does ☒ does not request restoration of her former name, _____.
This request is not made for any illegal or fraudulent reason.

VIII.

The Plaintiff further states that no other cases in the State of Arkansas or any state or territory involve the same claim or subject matter as this case.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, requests against Defendant, the following relief:

(a) A Decree of Divorce dissolving the bonds of matrimony between the parties based the grounds of living separate and apart from each other for eighteen continuous months without cohabitation, regardless of fault or reason.

(b) That the Separation and Property Settlement Agreement attached hereto as Exhibit "A" be incorporated herein by reference and have the same force as if stated herein in full.

(c) For judgment and relief as set forth in this Petition.

(d) For such other relief and judgment as is just and equitable in the premises.

Respectfully submitted,

Joseph E Guess

Signature of Plaintiff

Joseph Guess

Print Name

STATE OF ARKANSAS

COUNTY OF Carroll

COMES NOW, Plaintiff, Joseph E Guess, and being first duly sworn, deposes and states that he/she is the Plaintiff in the above-entitled action, that he/she has read the foregoing Verified Petition and voluntarily executed the same, and that he/she knows the contents thereof to be true, except as to those items stated on information, and believes those items to be true.

Joseph E Guess

Signature of Plaintiff

SUBSCRIBED AND SWORN to before me this 15th day of April, 2022 by Joseph Guess, Plaintiff.

Laura McGuire

NOTARY PUBLIC

Residing at: _____

My Commission Expires: 08/05/2030

